

1 GIA N. MARINA
Nevada Bar No. 15276
2 **CLARK HILL PLLC**
1700 South Pavilion Center Drive, Suite 500
3 Las Vegas, Nevada 89135
E-mail: gmarina@clarkhill.com
4 Telephone: (702) 862-8300
Facsimile: (702) 778-9709
5 *Attorney for Defendant*
National Consumer Telecom & Utilities
6 *Exchange, Inc.*

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 ERIC ROJAS-GUANCHIA,

11 Plaintiff,

12 vs.

13 NATIONAL CONSUMER TELECOM &
14 UTILITIES EXCHANGE, INC., and
CLARITY SERVICES, INC.,

15 Defendants.
16

Case No. 2:25-cv--00702

**JOINT MOTION FOR EXTENSION OF
TIME FOR DEFENDANT NATIONAL
CONSUMER TELECOM & UTILITIES
EXCHANGE, INC. TO FILE ANSWER**

FIRST REQUEST

17 Defendant National Consumer Telecom & Utilities Exchange, Inc. ("NCTUE") has
18 requested an extension of time to answer, move or otherwise respond to the Complaint in this
19 matter, to which Plaintiff has no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY
20 STIPULATED AND AGREED to by and among counsel, that NCTUE's time to answer, move or
21 otherwise respond to the Complaint in this action is extended from May 14, 2025 through and
22 including **June 13, 2025**. The request was made by NCTUE so that it can have an opportunity to

23 //

24
25
26
27
28

1 collect and review its internal files pertaining to the allegations in the Complaint, and Plaintiff
2 approves. This stipulation is filed in good faith and not intended to cause delay.

3 Respectfully submitted, this 14th day of May, 2025.
4

5 CLARK HILL PLLC

6 By: /s/ Gia N. Marina

7 Gia N, Marina

8 1700 South Pavilion Center Drive, Suite 500

9 Las Vegas, Nevada 89135

10 Telephone: (702) 862-8300

11 Facsimile: (702) 778-9709

12 Email: gmarina@clarkhill.com

13 *Attorney for Defendant National Consumer*

14 *Telecom & Utilities Exchange, Inc.*

No opposition

/s/ Gerardo Avalos

George Haines, Esq.

Nevada Bar No. 9411

Gerardo Avalos

Nevada Bar No. 15171

FREEDOM LAW GROUP

8985 S. Eastern Ave., Suite 350

Henderson, NV 89123

Phone: (702) 880-5554

Fax: (702) 385-5518

Email: ghaines@freedomlegalteam.com

Email: gavalos@freedomlegalteam.com

Attorneys for Plaintiff

15
16
17
18 IT IS SO ORDERED:

19
20 
21 Hon. Maximiliano D. Couvillier III

22 United States Magistrate Judge

23 DATED: 5/15/2025
24
25
26
27
28